

Exhibit 2

1 VOLUME: 1
2 PAGES: 1-188
2 EXHIBITS: See Index

3 IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
4 TRIAL DIVISION

4 PRINCE GEORGE CENTER, INC.)

5 On Behalf of Itself and All)

Others Similarly Situated)

6 Plaintiffs)

)

7 v.) Civil Action

) No. 5388

8 UNITED STATES GYPSUM CO.,)

et al.)

9 Defendants)

10 -----

11 Deposition of Robert A. Murphy

11 December 18, 1992

12 Boston, Massachusetts

12 -----

13 PRESENT:

14 Speights & Runyan

15 Daniel A. Speights, Esq.

15 304 Lee Avenue

16 Hampton, South Carolina 29924

16 and

17 Greitzer and Locks

17 Jonathan W. Miller, Esq.

18 1500 Walnut Street

18 Philadelphia, Pennsylvania 19102

19 for Plaintiffs

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24 FRITZ & SHEEHAN ASSOCIATES, INC.

24 295 Devonshire, Boston, MA 02110

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1 Square?

2 MR. JONES: I'm sorry. We're not
3 going to talk about the capability of what that
4 means can do or can't do.

5 MR. SPEIGHTS: That wasn't my
6 question, Mr. Jones.

7 Why don't you read the question back
8 to Mr. Jones.

9 (The record was read by the reporter)
10 A. I believe if you review the 25,000-page
11 inventory, you would most likely come up with all
12 the Peter Kostic documents at Winthrop Square.

13 Q. What would be on the 25,000-page
14 inventory indicating Peter Kostic documents?

15 A. His name. I would expect to find his
16 name.

17 Q. So with respect to MDU Matt Murphy
18 Deposition Exhibit 8 which we discussed this
19 morning that has written in hand at the top, "Mr.
20 Peter Kostic," you believe that name of Peter
21 Kostic would appear on the inventory?

22 A. Well, I can't swear to a certainty that
23 it would, but I believe it would.

24 MR. SPEIGHTS: Let's mark that

1 document as Deposition Exhibit 3 to this
2 deposition.

3 (Marked, Deposition Exhibit No. 3,
4 letter September 7, 196-, document 20094074)

5 Q. Is the means referred to in Deposition
6 Exhibit 2 a Casner & Edwards means?

7 MR. JONES: I don't know what that
8 means, "means."

9 MR. SPEIGHTS: That's what we've been
10 calling it, and you won't let me ask a whole lot
11 about it.

12 Q. What I'm trying to determine is the
13 system which is reflected in Exhibit 2, was that
14 created by Casner & Edwards?

15 A. I believe there have been affidavits
16 filed by Mr. Jones which provide detailed
17 information as to the creation of that system or
18 that means.

19 MR. JONES: They have in fact,
20 however, been filed in camera.

21 A. So I don't know how far my counsel wants
22 me to go in answering your question. I will take
23 his guidance.

24 Q. I assure you your counsel is very alert

1 question today.
2 A. I can answer that this way: That before
3 the re-review for Canada there were boxes which
4 contain formula documents for asbestos-containing
5 products. Those boxes were re-reviewed for notice,
6 and to comply with whatever orders were given in
7 Canada some were removed. I have not gone back
8 after that to see whether there still are such
9 boxes or such documents in Cambridge. They were
10 there before the re-review. Whether the re-review
11 caused them to come out or not I don't know. I
12 believe there probably still are formula boxes
13 considered to be trade secret in Cambridge for
14 asbestos-containing products.

15 Q. How about specifically for Monokote?

16 A. Yes. That's my belief.

17 Q. Does the customer list include customers
18 for asbestos-containing products?

19 A. Most likely.

20 Q. What do you mean by "customer" in the
21 context of the customer list you have here?

22 A. My recollection of those lists are these
23 are lists the client prepared of its customers for
24 any number of reasons.